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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Yali SONG,

Petitioner,

No. 2:18-cv-00919-GMN-VCF

vs.

Jeanne M. KENT, Director, Las Vegas Field
Office of United States Citizenship and
Immigration Services, in her official
capacity; and UNITED STATES
CITIZENSHIP AND IMMIGRATION
SERVICES,

Respondents.

**JOINT STIPULATION ON
DISCOVERY / BRIEFING
SCHEDULE**

Petitioner seeks review of an administrative decision. The parties agree that the issues and claims remaining in this action may be adjudicated by the Court through cross-motions for summary judgment and the submission of the federal agency's Administrative Record regarding the agency action being challenged by Petitioner. Accordingly, pursuant to Local Rule 16-1(c)(1), which provides that actions for review on an administrative record shall be governed by entry of a briefing schedule, the parties stipulate as follows:

I. Rule 26(f) Discovery Issues

The parties have conferred regarding the need, if any, for discovery beyond the Administrative Record but believe that all evidence needed to resolve this issue is contained in

1 the Administrative Record maintained by the U.S. Citizenship and Immigration Services
2 ("USCIS"). Therefore, the parties do not believe discovery needs to be conducted in this case

3 Respondents will provide Petitioner's counsel a copy of the Certified Administrative
4 Record maintained by USCIS by May 15, 2019. Respondents will also file the Certified
5 Administrative Record with the Court by May 15, 2019. To the extent possible, Respondents will
6 also provide a copy of the Certified Administrative Record in electronic format to both the Court
7 and Petitioner. Given the nature of much of the information contained in the Certified
8 Administrative Record, and notwithstanding the access-limitations contained in Fed. R. Civ. P.
9 5.2(c), the parties stipulate that the Certified Administrative Record that is filed with the Court
10 will be unredacted and submitted under seal pursuant to Fed. R. Civ. P. 5.2(f).

11 **II. Briefing Schedule**

12 Pursuant to Local Rule 16-1(c)(1), the parties agree to the following briefing schedule:

13 June 15, 2019: Petitioner will file her Motion for Summary Judgment.

14 July 6, 2019: Respondents will file any response to Petitioner's Motion for Summary
15 Judgment in addition to its own Cross-Motion for Summary Judgment.

16 July 20, 2019: Petitioner will file any response to Respondents' Cross-Motion for
17 Summary Judgement and/or reply to Respondent's Response to Petitioner's Motion for Summary Judgment.

18 August 3, 2019: Respondents will file any reply to Petitioner's Response to Respondents'
19 Cross-Motion for Summary Judgment.

Respectfully submitted this 22nd day of April, 2019.

LAW OFFICE OF ALEXANDER R. VAIL, LLC

NICHOLAS A. TRUTANICH
United States Attorney

/s/ Alexander R. Vail
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/s/ Mark Woolf
MARK WOOLF
Assistant United States Attorney
Attorneys for Respondents

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 4-23-2019